

OSBORN LAW P.C.

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July 15, 2023

MEMO ENDORSED.

VIA ECF

Honorable Ona T. Wang
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, New York 10007-1312

Re: *Fountain v. Commissioner of Social Security*
Civil Action No. 1:22-cv-10927-OTW

Dear Judge Wang,

We write on behalf of our client, Ebony Fountain, to request additional time to file her motion for judgment on the pleadings which is currently due on July 14, 2023 per the Court's June 6, 2023 Order Granting Extension of Time. This is the third request for an extension of time. Plaintiff requests this extension because of the long length of the record and our office has six briefs due in the next six days.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file her motion for judgment on the pleadings on or before: **July 28, 2023;**
- Defendant to file its response to plaintiff's motion/cross motion on or before: **October 6, 2023;** and
- Plaintiff to file her reply, if any, on or before: **October 20, 2023.**

Thank you for your consideration of this request.

Honorable Ona T. Wang
July 15, 2023
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Respectfully submitted,

s/Daniel A. Osborn
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cc: Avni Dinesh Gandhi, Esq. (by ECF)

Application **GRANTED.**

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Ona T. Wang', is written over a horizontal blue line.

Ona T. Wang 7/14/23
U.S.M.J.